

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

CHASE WILLIAMS and WILLIAM ZHANG,
individually and on behalf of all others similarly
situated,

Plaintiffs,

v.

BLOCK.ONE, BRENDAN BLUMER, and
DAN LARIMER,

Defendants.

Case No. 1:20-cv-02809-LAK

Honorable Lewis A. Kaplan

DECLARATION OF KYLE W. ROCHE

I, Kyle W. Roche, declare as follows:

1. I am a partner at Roche Cyrulnik Freedman LLP. I am admitted to the bar of the State of New York and admitted to practice before this Court and am in good standing.

2. I respectfully submit this declaration in support of the motion of JD Anderson, David Muhammad, Rajith Thiagarajan, Chase Williams, and Token Fund I LLC for: (1) consolidation of this Action with *Crypto Assets Opportunity Fund LLC et al. v. Block.one et. al.*, Case No. 1:20-cv-03829 (S.D.N.Y. May 18, 2020) (the “Crypto Assets Opportunity Action”); (2) appointment as lead plaintiffs; and (3) approval of lead plaintiffs’ selection of lead counsel.

3. Attached hereto are true and correct copies of the following documents:

Exhibit A: Sworn certifications pursuant to the Private Securities Litigation Reform Act of 1995:

Exhibit A-1: JD Anderson certification

Exhibit A-2: David Muhammad certification

Exhibit A-3: Rajith Thiagarajan certification

Exhibit A-4: Chase Williams certification

Exhibit A-5: Token Fund I LLC certification

Exhibit B: Firm Resume of Roche Cyrulnik Freedman LLP

Exhibit C: April 8, 2020 Notice of Pendency of this Class Action on Business Wire

Exhibit D: Charts reflecting estimated losses:

Exhibit D-1: JD Anderson estimated loss chart

Exhibit D-2: David Muhammad estimated loss chart

Exhibit D-3: Rajith Thiagarajan estimated loss chart

Exhibit D-4: Chase Williams estimated loss chart

Exhibit D-5: Token Fund I LLC estimated loss chart

Dated: June 8, 2020



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